

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
HARRISONBURG DIVISION

UNITED STATES OF AMERICA

v.

CHARLES JOSEPH HOOD

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Case No. 5:22-CR-3

UNITED STATES' PROFFER OF FACTS IN SUPPORT OF GUILTY PLEA

This proffer of facts summarizes the facts and circumstances surrounding the criminal conduct of the defendant CHARLES JOSEPH HOOD (herein, HOOD), that is at issue in this case. Had this case proceeded to trial, the United States would have proven these facts beyond a reasonable doubt. This proffer of facts does not necessarily contain all of the information obtained during this investigation and applicable to an accurate Presentence Report and Sentencing Guidelines calculation.

1. On or about January 4, 2022, in the Western District of Virginia, HOOD, by force, violence, and intimidation did take from the person and presence of another, namely employees of the First Citizens Bank located at 320 University Blvd, Harrisonburg, Virginia, approximately \$15,908.00 in money belonging to and in the care, custody, control, management, and possession of the First Citizens Bank, a bank for which the deposits were then insured by the Federal Deposit Insurance Corporation, and in committing such offense, HOOD, did assault and put in jeopardy the life of another person by the use of a dangerous weapon.

HOOD Robs the First Citizens Bank

2. On January 4, 2022, HOOD entered the First Citizen Bank located at 320 University Boulevard, Harrisonburg, Virginia 22801, within the Western District of Virginia. HOOD was wearing a dark colored mask, sunglasses, a dark colored hat, a wig, and brown work boots.

3. HOOD approached a manager of the bank, Victim-1, and inquired about opening an account. Victim-1 led HOOD into his office. HOOD provided Victim-1 with a red colored makeshift bag and a gray glove. HOOD instructed Victim-1 to put on the glove and to put cash in the bag. HOOD brandished what appeared to be a firearm, but which was later found to be a Daisy Outdoor Products Powerline 426 .177 cal. BB gun.

4. HOOD directed Victim-1 from his office to the area behind the teller station of the bank while carrying the BB gun. Behind the counter were two tellers, Victim-2 and Victim-3. While continuing to brandish the BB gun, HOOD told Victim-1 to retrieve large bills only, not to provide dye packs, and not to trigger the bank's alarm system. Victim-1 approached Victim-2 and then Victim-3 separately to acquire cash and placed cash inside the red bag provided by HOOD. In total, Victim-1 placed \$15,908.00 in United States Currency inside the red bag. During this encounter, Victim-2 pressed the bank's silent alarm system alerting law enforcement.

5. HOOD then retrieved the red bag from Victim-1. HOOD exited the bank and went around the corner where he retrieved a bicycle and departed.

HOOD Flees the Scene

6. HOOD rode the bicycle to an area behind a Firehouse Subs restaurant

approximately a half a mile away. There, HOOD discarded the bicycle, wig, and his outer jacket.

7. HOOD walked to the Xenia A Kebab Grille, a Mediterranean restaurant. HOOD entered the bathroom of the restaurant. Inside the bathroom, HOOD lifted an oil painting and placed the BB gun behind the painting so that it was out of view and undetectable.

8. HOOD then walked .2 miles to the nearby Walmart Supercenter. HOOD entered the store and located a pair of gray shoes. HOOD purchased the shoes with cash at a self-checkout terminal. HOOD then entered a bathroom where he put on the shoes and discarded his brown work boots in a garbage can.

9. HOOD then exited the Walmart and began walking east in the parking lot towards the Home Depot. HOOD began attempting to call a taxi company using his cellular phone.

The Harrisonburg Police Department Intervenes

10. The Harrisonburg Police Department (“HPD”) received a notice from the silent alarm triggered at the bank and immediately sent officers to canvas the area. HPD arrived and spoke with the employees of the First Citizens Bank and obtained a general description of the individual who had robbed the bank.

11. An officer of the HPD saw HOOD walking quickly in the parking lot of Home Depot. The officer observed that HOOD matched the description given for the individual who robbed the First Citizens Bank.

12. The officer attempted to contact HOOD while on foot. The officer called out to HOOD to stop. HOOD began walking faster and called back that his wife was in labor. HOOD began running and went through the parking lots of an Olive Garden restaurant and a Krispy

Kreme restaurant. HOOD then ran into traffic on Route 33.

13. HPD officers detained HOOD and then patted down HOOD for possible weapons. During the pat down, HPD found a red bag stuffed into HOOD's pants. Inside the red bag was \$15,606.00 in United States currency. HOOD also possessed a gray glove which matched the one left with Victim-1, except that it was of the opposite hand. HOOD was arrested at this time.

14. HPD searched the Walmart Supercenter and found the discarded work boots in the bathroom. HPD located the discarded bicycle, wig, and jacket behind the Firehouse Subs restaurant. HPD also obtained video footage from the First Citizens Bank and the Walmart Supercenter. HPD was, at that time, unable to locate the weapon used by HOOD during the bank robbery.

15. During these events, First Citizens Bank was an FDIC Insured Institution.

HOOD Confesses to a Cellmate

16. In January 2022, HOOD was detained on state charges in the Rockingham Regional Jail. HOOD was housed in the same group as D.L. HOOD told D.L. details about how he committed the robbery of the First Citizens Bank on January 4, 2022. Specifically, HOOD told D.L. he was wearing a wig during the robbery and he gave the bank employee a glove to wear. HOOD told D.L. he used a fake gun and hid the gun behind a painting at a Firehouse Subs restaurant. HOOD told D.L. that he purchased a pair of shoes at a nearby Walmart and had intended to go to Mexico with the money.

17. D.L. related this information to the HPD and the Federal Bureau of Investigation ("FBI") in June 2022. HPD and the FBI went to the Firehouse Subs restaurant to check for the

weapon, however there were no paintings in the bathrooms. HPD and the FBI check other restaurants nearby and came to Xenia A Kebab Grille. Inside this restaurant, HPD and the FBI found an oil painting. Behind the painting was a Daisy Outdoor Products Powerline 426 .177 cal. BB gun.

18. The actions taken by HOOD as described above were taken willfully, knowingly, and with the specific intent to violate the law. HOOD did not take those actions by accident, mistake, or with the belief that they did not violate the law.

Respectfully submitted,

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